

NRC Staff Comments on NEI 99-03, Revision 1 (Provided 01 24 03)

Comments on NEI 99-03, Revision 1 Appendix A, Smoke Evaluation

The appendix should evaluate for success (i.e. not having smoke in both the control room and the alternate shutdown panel). Plans for a simultaneous contamination of both locations as allowed by bullet three under §3, Success Path Logic results in a situation where GDC 19 is not met. If that condition arises, the situation warrants the issue being placed in the corrective action program. It also necessitates the implementation of compensatory actions. Since Bullet three reflects failure to meet GDC 19, it is unacceptable and should be deleted.

The staff recommends the following: 1) The title of §3 be "Contingency Logic Evaluation," 2) the last bullet on page A-1 be made the last bullet in §2, and 3) the first bullet under §2, Assessment read, "Verify that a single credible fire event does not simultaneously result in the contamination of the control room and the alternate shutdown panel such that reactor control cannot be maintained from one of the locations." For the latter case distance and barriers may be insufficient to assure that the alternate shutdown panel and the control room are not simultaneously contaminated.

